

July 17, 2006

To Whom It May Concern:

I am writing this letter in concern for the proposed Business Opportunity Rule R511993. I feel that the Rule could prevent me from continuing as an Arbonne Independent Consultant, should it stay in its present form. It is my understanding that the FTC's responsibilities are to protect the public from "unfair and deceptive acts or practices," and if you look at some areas of the proposed rule, it will make it almost impossible for me to sell Arbonne products. Furthermore, it will hinder the sponsorship of people into the business.

I am strongly opposed to the 7-day waiting period to sign up new Consultants. There are several reasons for my opposition with the restrictive 7-day waiting period. First, when a Consultant starts the business they are paying the nominal amount of money to obtain their start up materials. When they are unable to receive the items, it gives impression that there may be something wrong with the products or the Arbonne opportunity. Secondly, under this waiting period I will be required to keep detailed records of when I first make contact with someone about Arbonne and then when to exactly follow up. One thing that is so important in our business is getting to share in the excitement of those we share our products with. It is in that initial moment that the true enthusiasm is expressed because of the immediate results they experience with Arbonne products. I am very concerned that the waiting period will limit the growth of my business because of the stall in time that you are given.

The proposed rule also mentions that any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices will be released. That is an unfair statement if the company was found innocent. It also implies a wrongdoing that may be incorrectly stated. Not only that, it is unfair to disclose information unless Arbonne has been found guilty of something. That is an unfair accusation to have on your back when you haven't done anything wrong. If we are innocent until proven guilty then we shouldn't have to suffer the consequences of something that hasn't occurred.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I wouldn't have a problem giving references but with the world we live in today, it makes that difficult. I am not comfortable giving out names especially with all of the identity theft issues that we face each day. Not only that but that information is personal and without their permission or knowledge, I will not be able to do so. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.

I have been an Arbonne Independent Consultant for more than 2 years. I became a consultant because I love the products and I needed something else in my life. I am a Hair Stylist of 23 years and it takes a toll on your body and mind and this business has been a blessing in my life. I have been approached by many Network Marketing Companies and never trusted the one's with a small foundation and an unfair Compensation Plan. I researched this company before I decided to put my heart and soul (and money) in to this business. I have never felt misled by this company and have seen that their main priority is the foundation, which are THE PEOPLE!

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental and unintentional consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me.

Thank you for your time and understanding.

Sincerely,  
Teri Foster